

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

U.S. DISTRICT COURT
EASTERN DISTRICT-WI
FILED

2018 SEP 18 P 3:30

STEPHEN C. DRIES
CLERK

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No.

18-CR-184

RACHEL MORZFELD,

Defendant.

[18 U.S.C. §§ 922(a)(6) & 924(a)(2)]

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES:

1. On or about December 8, 2017, in the State and Eastern District of Wisconsin,

RACHEL MORZFELD,

in connection with the acquisition of a firearm from Paddock Lake Sporting Goods, a federally licensed firearms dealer in Salem, Wisconsin, knowingly made a false and fictitious written statement intended and likely to deceive Paddock Lake Sporting Goods as to a fact material to the lawfulness of the sale and disposition of such firearm under the provisions of Chapter 44 of Title 18, United States Code.

2. In particular, in connection with the purchase of the firearm described below, Rachel Morzfeld falsely stated on the Firearms Transaction Record (ATF Form 4473) that she

was the actual transferee/buyer of the firearm when, in fact, she was acquiring the firearm for someone else.

3. The firearm is further described as a Cobra, model FS380, .380 caliber pistol, bearing serial number FS115811.

All in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT TWO

THE GRAND JURY FURTHER CHARGES:

1. On or about January 5, 2018, in the State and Eastern District of Wisconsin,

RACHEL MORZFELD,

in connection with the acquisition of a firearm from Paddock Lake Sporting Goods, a federally licensed firearms dealer in Salem, Wisconsin, knowingly made a false and fictitious written statement intended and likely to deceive Paddock Lake Sporting Goods as to a fact material to the lawfulness of the sale and disposition of such firearm under the provisions of Chapter 44 of Title 18, United States Code.

2. In particular, in connection with the purchase of the firearm described below, Rachel Morzfeld falsely stated on the Firearms Transaction Record (ATF Form 4473) that she was the actual transferee/buyer of the firearm when, in fact, she was acquiring the firearm for someone else.

3. The firearm is further described as a Smith & Wesson, model M & P 15 Sport II, .223/5.56 caliber rifle, bearing serial number TF80061.

All in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT THREE

THE GRAND JURY FURTHER CHARGES:

1. On or about January 11, 2018, in the State and Eastern District of Wisconsin,

RACHEL MORZFELD,

in connection with the acquisition of a firearm from Paddock Lake Sporting Goods, a federally licensed firearms dealer in Salem, Wisconsin, knowingly made a false and fictitious written statement intended and likely to deceive Paddock Lake Sporting Goods as to a fact material to the lawfulness of the sale and disposition of such firearm under the provisions of Chapter 44 of Title 18, United States Code.

2. In particular, in connection with the purchase of the firearm described below, Rachel Morzfeld falsely stated on the Firearms Transaction Record (ATF Form 4473) that she was the actual transferee/buyer of the firearm when, in fact, she was acquiring the firearm for someone else.

3. The firearm is further described as a Glock, model 23, .40 caliber pistol, bearing serial number BBFV450.

All in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT FOUR

THE GRAND JURY FURTHER CHARGES:

1. On or about January 17, 2018, in the State and Eastern District of Wisconsin,

RACHEL MORZFELD,

in connection with the acquisition of a firearm from Paddock Lake Sporting Goods, a federally licensed firearms dealer in Salem, Wisconsin, knowingly made a false and fictitious written statement intended and likely to deceive Paddock Lake Sporting Goods as to a fact material to the lawfulness of the sale and disposition of such firearm under the provisions of Chapter 44 of Title 18, United States Code.

2. In particular, in connection with the purchase of the firearm described below, Rachel Morzfeld falsely stated on the Firearms Transaction Record (ATF Form 4473) that she was the actual transferee/buyer of the firearm when, in fact, she was acquiring the firearm for someone else.

3. The firearm is further described as a Glock, model 23, .40 caliber pistol, bearing serial number BBFV449.

All in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT FIVE

THE GRAND JURY FURTHER CHARGES:

1. On or about February 9, 2018, in the State and Eastern District of Wisconsin,

RACHEL MORZFELD,

in connection with the acquisition of a firearm from Buisse Custom Arms, a federally licensed firearms dealer in Union Grove, Wisconsin, knowingly made a false and fictitious written statement intended and likely to deceive Buisse Custom Arms as to a fact material to the lawfulness of the sale and disposition of such firearm under the provisions of Chapter 44 of Title 18, United States Code.

2. In particular, in connection with the purchase of the firearm described below, Rachel Morzfeld falsely stated on the Firearms Transaction Record (ATF Form 4473) that she was the actual transferee/buyer of the firearm when, in fact, as Rachel Morzfeld well knew, she was acquiring the firearm for someone else.

3. The firearm is further described as a German Sport Guns, model AK-47 Rebel, .22LR caliber rifle, bearing serial number A561768.

All in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

FORFEITURE NOTICE

Upon conviction of the offenses in violation of Title 18, United States Code, Section 922(a)(6) set forth in this Indictment, the defendant, Rachel Morzfeld, shall forfeit to the United States pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c), any and all firearms and ammunition involved in the knowing violation of 18 U.S.C. § 922(a)(6), including, but not limited to:

1. a Cobra, model FS380, .380 caliber pistol, bearing serial number FS115811;
2. a Smith & Wesson, model M & P 15 Sport II, .223/5.56 caliber rifle, bearing serial number TF80061;
3. a Glock, model 23, .40 caliber pistol, bearing serial number BBFV450;
4. a Glock, model 23, .40 caliber pistol, bearing serial number BBFV449, and
5. a German Sport Guns, model AK-47 Rebel, .22LR caliber rifle, bearing serial number A561768.

A TRUE BILL:

FOREPERSON

Dated: 9/18/18


MATTHEW D. KRUEGER
United States Attorney